



Norman H. Bangerter Governor

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Executive Director

December 30, 1986

Kelcey Land U.S. EPA, Region VIII One Denver Place, Suite 1300 999 18th Street Denver, CO 80202-2413



Richardson Flat Sampling Activities Report Air Sampling TDD R-8-8605-12

Dear Kelcey:

The following are the State's comments regarding the above reports. As the report contained no analytical data or data interpretation, it was not deemed appropriate to have our Bureau of Air Quality review it at this time.

Page 1

- Kelcey Land misspelled.
- The State was not contacted regarding this sampling event. This is a very serious breach of FIT protocol.

Page 2

In the Site Description, it should state that a wetlands area approximately 30 acres in extent is located just beyond the toe of the tailings dam.

Page 3

- It is unlikely that the mean monthly temperature for Park City is 80°F in June, July, and August. In the same paragraph it states that the average July temperature is 60°F.
- The text should state that the barometric pressures given are corrected for altitude.

Page 4

- On Figure 2, the AM-O1 sampler site is plotted southeast of the tailings, while the text states in numerous places that the sampler is located southwest of the site.
- Similarly, Figure 2 shows samplers AM-02, AM-05A and AM-05B located on top of the tailings, while the text states that they were located off the tailings. Which is correct?

Page 5

- -- If the State had been contacted regarding the sampling trip, very possibly they could have supplied the appropriate calibration units for the PM-10s. Thus, but not contacting the State, the data base for evaluating the site's air pathway has been reduced significantly.
- -- On the first sampling day, when the FIT was hustling to set up the Hi-Vols and monitor an event in progress, it is understandable why the Hi-Vols were started at staggered intervals. After that initial day, however, it is unclear why the Hi-Vols were started up at staggered intervals. Also, if the generators were capable of running for only 10-11 hours, why was the sampling time not shortened to 10 hours or less to provide uniformity.

Page 8

- -- The State questions whether taking a soil sample from the vicinity of the proposed Silver Creek Tailings NPL site is appropriate for background soil sampling.
- -- The State feels that "blank" filters should have been sent to the laboratory as part of the original sample submittal and not as a separate shipment.

Sincerely,

Muhammed A. Slam

Muhammad A. Slam, Engineer Acting Superfund Program Manager

JT/pw

9585U/9-10

Comments on Draft Sampling Activities Report for Richardson Flat Air Sampling



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- 1. Figure 1 Make site boundaries more obvious. State which topographic quad this was taken from.
- 2. Figures 2 and 3 State which topographic quad this was taken from.